

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF OHIO**

GRAND,	)	
	)	
v.	)	Case No. 1:22-cv-1594
	)	
UNIVERSITY HEIGHTS, et al.	)	JUDGE BRIDGET M. BRENNAN
<hr style="width: 40%; margin-left: 0;"/>	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME WITHIN**  
**WHICH TO RESPOND TO DEFENDANTS COONEY AND KLUZNIK’S MOTIONS TO**  
**DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT**

TO THE COURT:

On July 28, 2023, Defendant Cooney and Defendant Kluznik separately filed motions to dismiss the claims against them in the First Amended Complaint. Plaintiff respectfully requests that the Court enlarge the time to respond to the two motions until September 4, 2023.

Counsel for Plaintiff conferred with counsel for both defendants and neither one opposed the enlargement of time for Plaintiff to file a response. Counsel for Defendant Kluznik asked for an enlargement of an additional 7 days to file a brief in reply. Plaintiff does not oppose an enlargement of time of 7 days to file a reply brief for either Defendant.

Accordingly, Plaintiff respectfully requests that the Court issue an Order enlarging the time for Plaintiff to file responses to Defendant Kluznik’s Motion to Dismiss and Defendant Cooney’s Motion to Dismiss until September 4, 2023, and that briefs in Reply may be filed until September 18, 2023.

**[SIGNATURE ON NEXT PAGE]**

Dated: August 2, 2023

Respectfully submitted,

/s/ Jonathan Gross

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*Counsel for Plaintiff Daniel Grand*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing is being served on opposing counsel via email on

August 2, 2023

/s/ Jonathan Gross

**CERTIFICATE OF CONFERENCE**

I certify that I have conferred with opposing counsel and the motion is unopposed.

/s/ Jonathan Gross